

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

IN RE APPLICATION OF BENJAMIN
STEINMETZ FOR AN ORDER TO TAKE
DISCOVERY FROM VALE S.A., VALE
AMERICAS, INC., RIO TINTO PLC, AND
RIO TINTO LIMITED PURSUANT TO 28
U.S.C. § 1782

Case No. 1:20-mc-00212

**AFFIDAVIT OF
VICTORIA R. MORRIS**

Pursuant to Local Rule 1.3(c), I, Victoria R. Morris, certify as follows:

1. I am an associate of the law firm of Kobre & Kim LLP.
2. I submit this affidavit in support of my motion for admission *pro hac vice* in the above-captioned matter.
3. As shown in the Certificate of Good Standing annexed hereto, I am a member in good standing of the bars of the state of Florida and the District of Columbia.
4. I have never been convicted of a felony.
5. I have never been censured, suspended, disbarred, or denied admission or readmission by any court.
6. There are no pending disciplinary proceedings against me in any State or Federal court.

I respectfully request that I be permitted to appear as counsel and advocate *pro hac vice* in this application for Applicant Benjamin Steinmetz.

Dated: May 22, 2020

Respectfully submitted,

/s/ Victoria R. Morris

Counsel for Applicant